



300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001
202.379.7100 Tel
202.466.7718 Fax
www.comcast.com

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January 9, 2013

By Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Areas Shown as Unserved on the National Broadband Map for Connect America
Phase I Incremental Support, Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

Since first submitting data in January 2010, Comcast Corporation (“Comcast”) has fully participated in collecting data about the contours of its broadband footprint and providing that information to the mapping entities in the 39 states and District of Columbia where Comcast provides “high-speed Internet access.” Comcast provides this information to the state mapping entities twice each year, reflecting Comcast’s service areas and maximum advertised speeds as of June 30 and December 31. Indeed, Comcast currently is in the midst of updating its census block data as of December 31, 2012 for submission over the next several weeks.

In accordance with the Wireline Competition Bureau’s request for input on areas where coverage is not accurately reflected on the current version of the National Broadband Map,¹ which reflects data as of December 2011, an independent consultant retained by Comcast compared the more than 1.6 million census block areas served by Comcast that it identified in mid-2012 submissions to the state mapping entities with the census blocks listed by the FCC as unserved. Based on his initial review in the limited time afforded by the instant comment cycle, Comcast’s consultant concluded that there were approximately 15,870 census block areas identified on the FCC’s list as unserved by broadband that Comcast included in its mid-2012 reports to the state mapping entities as census block areas in which Comcast provides high-speed

¹ *Wireline Competition Bureau Seeks Comment on Areas Shown as Unserved on the National Broadband Map for Connect America Phase I Incremental Support*, WC Docket No. 10-90, Public Notice, DA 12-1961 (rel. Dec. 5, 2012) (“December 5 Public Notice”); *Wireline Competition Bureau Updates the List of Potentially Unserved Census Blocks in Price Cap Areas and Extends the Deadline for Comment on the List*, WC Docket No. 10-90, Public Notice, DA 12-2001 (rel. Dec. 10, 2012).

Internet access service, *i.e.*, areas where Comcast provides fixed wireline broadband service with speeds of at least 3 Mbps downstream and 768 kbps upstream.² Comcast anticipates that the updated version of the National Broadband Map that reflects the mid-2012 data will depict these 15,870 census blocks as served by broadband. In response to the Bureau's request, a list of those approximately 15,870 census block areas currently identified as unserved on the National Broadband Map is being submitted herewith in electronic format.³ Because this list represents commercially sensitive information that is not otherwise publicly available and that is protected by the Freedom of Information Act and the Commission's rules, the list qualifies as Confidential Information and is being submitted on a confidential basis pursuant to the Third Protective Order in this proceeding.⁴

Comcast's consultant is continuing to analyze other potential inconsistencies between the FCC's list and the more recent Comcast information to determine whether there are additional census block areas that should be designated as served by broadband service for purposes of Connect America Fund Phase I support. Any additional census blocks that inaccurately are reflected on the current National Broadband Map will be included in Comcast's reply comments in this proceeding.

Respectfully submitted,

/s/ Mary McManus
Mary McManus

Enclosure

cc: Charles Tyler
Ryan Yates

² The Bureau specifically sought comment on "whether commenters have brought any changes to the attention of the relevant state mapping entity or any other entity, and, if they have, . . . the outcome of any of those discussions." *December 5 Public Notice* at 1-2. As noted, these census blocks were filed with the relevant state mapping entities, and Comcast expects that these locations will be included in the next broadband report that NTIA issues to update its December 2011 data.

³ *December 5 Public Notice* at 2 ("Commenters are encouraged . . . to provide the Commission an electronic copy of any updates to the list of blocks as a table that contains just changes (*e.g.*, a list of additional blocks and/or a list of blocks that do not belong on the list).")

⁴ *Connect America Fund*, Third Protective Order, 27 FCC Rcd 10276 (2012) (DA 12-1418); *see also* 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

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